

FEDERAL ON-SCENE COORDINATOR'S REPORT

FOR

**CAPITOL ASSAX LABS SITE
Baltimore, Maryland**

**CERCLA REMOVAL ACTION
May 28, 1987 through July 8, 1987**



**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

100001

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

TABLE OF CONTENTS

Facts Sheet

Foreword

- I. Introduction
 - A. Nature of the Site/Initial Situation
 - B. Location of the Site
 - C. Efforts to Obtain Cleanup by Potential Responsible Parties
- II. Roster of Agencies, Organizations and Individuals
 - A. Organization of the Response
 - B. Glossary of Abbreviations
- III. Narrative of Events
- IV. Resources Committed
 - A. Funding
 - B. Chronological Expenditure Log
 - C. Estimated Total Cost Summary
- V. Effectiveness of the Response
 - A. Activities of the Various Agencies
 - 1. Potential Responsible Parties
 - 2. State/Local Agencies
 - 3. Federal Agencies and Special Forces
 - 4. Contractors
 - B. Disposal Methods and Quantities Removed
- VI. Chronology of Events
- VII. Problems Encountered and Recommendations
- VIII. Appendices
 - A. Location Map/Site Sketches
 - B. Funding Documentation
 - C. Site Safety Protocol
 - D. POLREPs
 - E. Newspaper Articles
 - F. Photographic Documentation
 - G. CERCLA 106 Order
 - H. Delivery Order and Procurement Request for ERCS Contractor
 - I. Analytical Data
 - J. Region III Incident Notification Report

100002

**REGION III
CERCLA REMOVAL ACTION**

PROJECT #168

FACTS SHEET

SITE: Capitol Assay Labs Site

SIZE: Four buildings, approximately 10,000 square feet each

LOCATION: Whittington Business Center, Baltimore, Maryland

APPROVAL DATE: May 28, 1987

PROJECT DATES: May 28, 1987 through July 8, 1987

DESCRIPTION: The Capitol Assay Labs Site was a precious metals reclaimer located in a small business/industrial park in Baltimore City, Maryland. Capitol Assay Labs had difficulty in meeting its financial obligations and ceased operations in March of 1987. Hazardous substances at Capitol Assay Labs were discovered accidentally on May 26, 1987 after one of the company's creditors received a court judgement to repossess assets from the facility. The creditors were accompanied by a representative of the Baltimore County Sheriff's Department and upon the discovery of open drums, chemical containers and gas cylinders, contacted Maryland's Office of Environmental Programs/Waste Management Administration (MDOEP/WMA). After Maryland's MDOEP/WMA of Health and Mental Hygiene had conducted an initial assessment, the EPA Emergency Response Section was contacted for assistance. The OSC activated \$50,000 under the Delegation of Authority (14-1-A, 5/1/85) to perform a chemical inventory of the buildings and provide site security until the responsible party agreed to take over the cleanup.

HAZARDOUS MATERIALS: Corrosive liquids, chlorine gas, sulfur dioxide, cyanides and miscellaneous chemicals.

QUANTITIES REMOVED: N/A - Responsible Party Takeover

OSC: Robert E. Caron, Lisa Marie Clark

REMOVAL CONTRACTOR: O.H. Materials, Inc., Findlay, Ohio

DISPOSAL LOCATION: N/A - RP Takeover

PROJECT CEILING: \$200,000

PROJECT COST: \$47,067 (estimated)

COMMENTS: The EPA started the cleanup, but after several days of legal discussions involving EPA Enforcement, the RP took over responsibility to complete the project.

Robert E. Caron, Sr. OSC

100003

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

FOREWORD

This report is submitted in accordance with procedures outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The primary thrust of the Plan is to provide a coordinated Federal response capability at the scene of an unplanned or sudden discharge of oil or hazardous substances that poses a threat to the public health or the environment. In addition, the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) promote a coordinated Federal, State and local response to mitigate situations at hazardous waste sites which pose an imminent hazard to public health. The Capitol Assay Labs Site presented an imminent hazard to public health which provided a legal basis for Federal response activities. The provisions of the NCP were implemented by the Environmental Protection Agency (EPA) Region III, Philadelphia, Pennsylvania.

Special thanks are extended to the many agencies and groups who participated in this Federal Removal Activity. This well-coordinated team effort on scene enabled a timely and efficient cleanup which prevented a major environmental incident due to the chemical hazards present on site.

We wish to thank all the persons who contributed to the successful response and commend them on their professional and timely handling of this pollution incident.

Robert E. Caron
Senior On-Scene Coordinator
U.S. EPA, Region III
Philadelphia, Pennsylvania

Lisa Marie Clark
Junior On-Scene Coordinator
U.S. EPA, Region III
Philadelphia, Pennsylvania

100004

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

INTRODUCTION

A. Nature of the Site/Initial Situation

Capitol Assay Laboratories, Ltd. consisted of four buildings and was a precious metals reclaimer that was believed to have operated from 1976 to approximately March of 1987 when it experienced difficulty meeting its financial obligations and ceased operations.

The site was discovered by accident when a collection agency, accompanied by a representative from the Baltimore County Sheriff's Office, went to Capitol Assay to seize anything of value to satisfy the creditor's claim against the company. Upon discovery of the chemicals and gas cylinders within each of the four buildings, the Sheriff's Department notified the Maryland Office of Environmental Programs Waste Management Administration (MDOEP/WMA). The MDOEP/WMA inspected the site on May 26, 1987 and observed poor housekeeping practices. Many containers of corrosive liquids including some labeled hydrochloric acid, sulfuric acid, nitric acid and hydrofluoric acid were located throughout the site. Gas cylinders labeled chlorine and sulfur dioxide were also observed on site. Due to the existing threat of fire and/or explosion, on May 27, 1987, the MDOEP/WMA contacted the EPA Region III Emergency Response Section (ERS) for assistance.

B. Site Location

The Capitol Assay Labs Site was located in a small business/industrial park at 2901 Whittington Avenue in Baltimore City, Maryland. The facility consisted of four buildings (2901-A, 2901-B, 2903-F, and 2903-G) that were leased from the Maryland Industrial Enterprise Development Company.

The site was located less than 1/2 mile from the nearest residential homes (not far from the intersection of Washington Boulevard and Patapsco Avenue) and approximately one mile from the nearest waterway (Gwynn Falls) which flowed directly into the Patapsco River.

Site sketches and a location map are presented in Appendix A of this report.

100005

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
INTRODUCTION (continued)

C. Efforts to Obtain Cleanup by Potential Responsible Parties

After the initial assessment, the OSC activated the \$50,000 Delegation of Authority (14-1-A, 5/1/85) to provide site security until the owner of the property could be located. Once in contact with Jack Meehan (President and owner of Capitol Assay Laboratories, Ltd.), the OSC advised him of his potential liability for cleanup costs should the EPA take action at this site. The owner agreed to take responsibility for the cleanup of the property working under the direction of EPA Enforcement.

At the time of this writing, cleanup operations are continuing and are being monitored by EPA Enforcement.

100006

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Capitol Assay Labs Site, Baltimore, MD

AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
U.S. Environmental Protection Agency Emergency Response Section 841 Chestnut Building Philadelphia, PA 19107 (215) 597-8907	Robert E. Caron Lisa Marie Clark	Sr. On-Scene Coordinator; responsible for the overall success of the project. Jr. OSC; assisted OSC during site activities.
U.S. Environmental Protection Agency Enforcement Branch 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Richard Dulcey	Issued bilateral consent agreement and monitored RP cleanup.
U.S. Environmental Protection Agency Office of Public Affairs 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Nanci Sinclair	Coordinated press releases, addressed media and residential concerns.
U.S. Environmental Protection Agency Office of Criminal Investigation 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Phil Andrews, Criminal Investigator	Performed criminal investigation using files obtained from the facility.
U.S. Coast Guard Marine Safety Office 40 S. Gay Street Baltimore, MD 21220 (301) 962-5112	Mike Geldmacher	Assisted with the initial site assessment, offered the use of the USCG mobile command post during EPA's assessment.
Agency for Toxic Substances Disease Registry (ATSDR) 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Joyce McCurdy	Certified that the Capitol file boxes were not contaminated and were safe to handle.

100007

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Capitol Assay Labs Site, Baltimore, MD (continued)

AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
State of Maryland Department of Health & Mental Hygiene Office of Environmental Programs Waste Management Administration 2103 Annapolis Road Baltimore, MD 21230 (301) 659-2950	Mark Cox	State OSC; involved with the initial site assessment and offered assistance.
State of Maryland Department of Health & Mental Hygiene Office of Environmental Programs Waste Management Administration 201 West Preston Street Baltimore, MD 21201 (301) 225-5731	Mansoor Zakia Peggy Powell Ray Feldman Bernie Baylog Bill Schmidt	Public Health Engineer Public Affairs State Enforcement
Baltimore County Sheriff's Department Courts Building 401 Bosley Avenue Towson, MD 21204 (301) 494-3151		Discovered threat while accompanying creditors of Capitol Assay through the facility.
Baltimore County Health Department Bureau of Industrial Hygiene 303 E. Fayette Street, 4th Floor Baltimore, MD 21202 (301) 396-4427	Derek Williams Charles Courtney	Contacted by State to assist in determining potential health threats.
Baltimore County Fire Department 1908 Holland Street Baltimore, MD 21223 (301) 396-0178	Ronald Brown Buz Melton	Fire Chief Haz Mat Chief

100008

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Capitol Assay Labs Site, Baltimore, MD (continued)

AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
Roy F. WESTON, Inc./SPER Division 53 Haddonfield Road, Suite 306 Cherry Hill, NJ 08002 (609) 482-0222	Patricia Donegan Kevin Scott Lynn Wilder Dave Butte	Technical Assistance Team (TAT); performed initial site assessment, provided photographic and site activities documentation, performed contractor monitoring, air monitoring, soil sample planning and implementation.
O.R. Materials, Inc. P.O. Box 551 Findlay, OH 45839 (800) 537-9560	John Bourret	ERCS prime contractor; provided site security and provided chemists needed to perform inventory of facility.
A & S Environmental Testing, Inc. P.O. Box 130 Tempe, PA 19560 (215) 926-6602	Craig Achenbach Stephen Scupp	Performed soil and water analysis.

100009

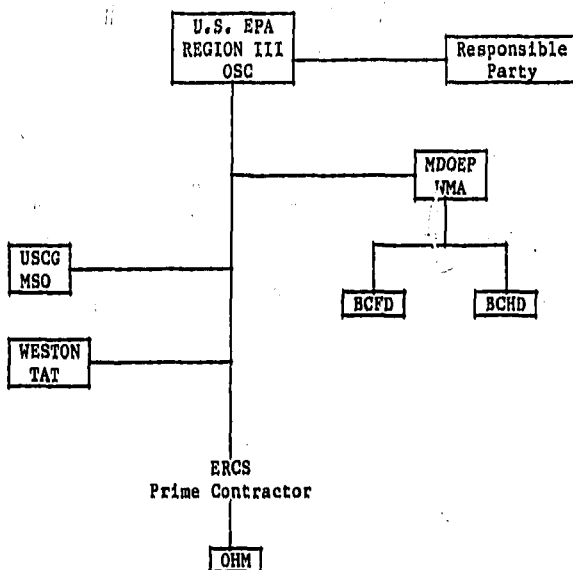
Capitol Assay Labs Site

Baltimore, Maryland

Federal OSC Report

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

A. Organization of the Response



100010

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

B. Glossary of Abbreviations

- | | |
|--------------|---|
| 1. BCFD | Baltimore County Fire Department |
| 2. BCHD | Baltimore County Health Department |
| 3. EPA | U.S. Environmental Protection Agency |
| 4. ERCS/OHM | Emergency Response Cleanup Services/O.H. Materials, Inc. |
| 5. ERS | U.S. EPA, Emergency Response Section |
| 6. MDOEP/WMA | Maryland Office of Environmental Programs/
Waste Management Administration |
| 7. OPA | U.S. EPA, Office of Public Affairs |
| 8. OSC | U.S. EPA, Federal On-Scene Coordinator |
| 9. PRP | Potential Responsible Party |
| 10. RP | Responsible Party |
| 11. TAT | Roy F. WESTON, Inc., Technical Assistance Team |
| 12. USCG/MSO | U.S. Coast Guard/Marine Safety Office |

100011

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

NARRATIVE OF EVENTS

The Capitol Assay Labs Site was what appeared to be an abandoned metal plating and reclaiming facility in a mixed business/industrial park located in Baltimore City, Maryland.

The site was discovered by accident when a creditor attempted to repossess assets in order to satisfy a claim against the company. The creditor was accompanied by a representative of the Baltimore County Sheriff's Department, who notified Maryland's Office of Environmental Programs, Waste Management Administration (MDOEP/WMA) of the potential threat that existed at the facility due to the presence of cylinders and chemical containers.

On May 26, 1987 personnel from MDOEP/WMA performed an initial assessment of the facility and found many open drums of corrosive liquids, chemical containers and gas cylinders. The State of Maryland contacted the EPA Region III Regional Response Center (RRC) in Philadelphia requesting emergency response assistance. OSCs Robert E. Caron and Lisa Marie Clark responded with members of TAT to the site where they met with representatives of both the State and USCG. A Level "B" entry (see Appendix F, Photo #2) was made inside the buildings which revealed several hundred open drums posing a fire and/or explosion threat and chemical containers stored in extremely incompatible situations throughout the office, laboratory, and warehouse areas.

The following morning the OSC contacted Jack Meehan (President and owner of Capitol Assay Labs) and informed him of his potential liability for cleanup costs should EPA become involved with the cleanup of this site. Mr. Meehan informed the OSC that he would assume the responsibility of the cleanup, but that he would like to first contact his attorney. After speaking with Mr. Meehan, the OSC used his Delegation of Authority (14-1-A, 5/1/85) to activate \$50,000 to provide site security and begin a chemical inventory of the four buildings. The OSC also spoke with a Mr. Dave Cohen, the chemist at Capitol

100012

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
NARRATIVE OF EVENTS (continued)

Assay Labs who provided a partial inventory of the chemicals contained in the buildings. Mr. Cohen also agreed to assist with the cleanup at the site, but the OSC informed him that the cleanup contractor would have to conform with OSHA regulations and that employees of the lab were not qualified to perform the cleanup. Later that evening, the owner/landlord of the property (Bob Becker) arrived on site and agreed to take partial responsibility for cleanup operations.

A bilateral consent agreement was drawn up by EPA Enforcement that provided the responsible party with guidance in the cleanup procedures. A local cleanup contractor (EnPro) was hired by the RP and cleanup operations proceeded under the direction of EPA Enforcement.

100013

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

RESOURCES COMMITTED

A. Funding

On May 28, 1987, Special Bulletin A was submitted regarding the use of and need for an emergency activation of \$50,000 under the OSC's Delegation of Authority, 14-1-A (5/1/85). A copy of Special Bulletin A is included as Appendix B of this report.

An additional funding request in the amount of \$150,000 was approved on June 4, 1987 bringing the project ceiling to \$200,000. A copy of the additional funding request is also located in Appendix B of this report.

B. Chronological Expenditure Log

Date 1987	E X T R A M U R A L		INTRAMURAL	Total Cost to Date	ceiling
	ERCS	TAT	EPA		
05/28	\$ 2,051.28	\$ 2,275.50	\$ 1,309.75	\$ 5,636.53	\$ 50,000
05/29	5,072.98	2,275.50	1,309.75	14,294.76	
05/30	5,560.89	2,275.50	1,309.75	23,440.90	
05/31	1,882.32	2,275.50	1,309.75	28,908.47	
06/03	--	--	--	28,908.47	\$200,000
06/10	6,998.40	--	--	35,906.87	
06/19	2,087.64	--	--	37,994.51	
07/06	9,072.00	--	--	47,066.51	
	\$32,725.51	\$ 9,102.00	\$ 5,239.00	\$47,066.51	\$200,000

C. Total Cost Summary (Estimated)

1. Extramural

ERCS	\$32,725.51
Personnel/Labor	
Equipment	
Materials	
Subcontractors	
a) Analytical	
b) Transportation	
c) Disposal	
d) Miscellaneous	
TAT	9,102.00
Extramural Subtotal	\$41,827.51

2. Intramural

EPA	\$ 5,239.00
Total Estimated Project Cost	\$47,066.51

100014

EFFECTIVENESS OF THE RESPONSE

A. Activities of the Various Agencies

1. Potential Responsible Parties

The responsible party (RP) accepted responsibility for the cleanup of the site after being notified by the EPA that a potential health threat existed at the facility. Initially, there was some delay on the part of the RP due to legal matters involving the EPA and RP. Eventually a cleanup contractor was located and cleanup operations were started. The cleanup proceeded under the direction of EPA Enforcement.

2. State and Local Forces

Personnel from the Baltimore County Sheriff's Office were the first to discover the chemical hazards on site and reported their findings to the MDOEP/WMA.

The MDOEP/WMA performed an initial assessment, realized the potential health threat posed by the site, and contacted security personnel to restrict access to the buildings. State personnel later requested assistance from the EPA Region III Emergency Response Section.

The Baltimore County Fire Department (BCFD) provided fire units and fire fighters during the assessment and remained on standby during the EPA chemical inventory. Fortunately, the services of the BCFD were not required.

3. Federal Agencies and Special Forces

Robert E. Caron served as the Federal On-Scene Coordinator (OSC) during the emergency response and subsequent assessment and was assisted by Jr. OSC Lisa Marie Clark. The OSCs were responsible for coordinating participants involved to ensure the completion of a proper cleanup action.

The Agency for Toxic Substances Disease Registry (ATSDR) reviewed wipe sample results taken from Capitol Assay Labs' files and certified they were safe to handle and not contaminated.

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
EFFECTIVENESS OF THE RESPONSE (continued)

A. Activities of the Various Agencies

3. Federal Agencies and Special Forces (continued)

EPA Enforcement was responsible for developing the bilateral consent agreement (106 Order) that provided the guidelines under which the responsible party was to proceed with the cleanup.

The Office of Public Affairs (OPA) was responsible for issuing press releases to ensure accurate media coverage and to address concerns expressed by area residents.

The United States Coast Guard/Marine Safety Office (USCG/MSO) provided the use of a mobile command post during the assessment.

4. Contractors

The Spill Prevention and Emergency Response Division of Roy F. WESTON, Inc. provided personnel from the TAT to provide support to the OSC as follows:

1. Soil sample planning and implementation,
2. photographic documentation of site activities,
3. air monitoring,
4. contractor monitoring,
5. site activities documentation,
6. coordination of laboratories, and
7. QA/QC of analytical results.

O.H. Materials, Inc. of Findlay, Ohio, was the ERCS prime contractor during the emergency response and provided the manpower and equipment necessary to perform the following:

1. Chemical inventory,
2. container sampling,
3. sampling analysis, and
4. site security.

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
EFFECTIVENESS OF THE RESPONSE (continued)

B. Disposal Methods and Quantities Removed

The RP party assumed all responsibility for the cleanup; and, therefore, the disposal methods and quantities removed were not monitored by the EPA Emergency Response Section.

In addition, the RP continues cleanup activities under advice and guidance of EPA Enforcement making disposal methods and quantities removed unavailable at the time of this writing.

100017

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

CHRONOLOGY OF EVENTS

This section presents a brief summary of events as they occurred during the Capitol Assay Labs Site in an effort to provide the reader with an overview of site activities.

05/26/87 MDORP/WMA performed an assessment at the Capitol Assay Laboratories, Ltd. after being notified by the Baltimore County Sheriff's Office of the potential threat that existed at the facility. (The Sheriff's Department had discovered the chemicals while accompanying a creditor who was trying to recover assets to satisfy a claim against the owner/President, John Meehan). The State of Maryland provided security personnel at the facility until such time as additional assistance could be obtained.

05/27/87 The EPA Region III Regional Response Center (RRC) received the report regarding Capitol Assay Laboratories from the State of Maryland. OSCs Robert Caron and Lisa Clark responded with members of TAT and met with State OSC Mark Cox. At 2200 hours, a Level "B" (see Appendix F, Photo #2) entry was made to assess the situation inside the four buildings, which appeared to be abandoned. The assessment within the building revealed hundreds of opened drums and chemical containers in extremely incompatible situations which posed a fire and/or explosion threat throughout the office, laboratory, and warehouse areas.

05/28/87 The OSCs, TAT, State and USCG representatives met at USCG/Marine Safety Office (MSO) in Baltimore to discuss a plan of action for the site. The State of Maryland and USCG agreed to having EPA assume the lead on this site. While at the MSO, OSC Caron contacted Mr. Jack Meehan (President and owner of Capitol) and advised him of the potential liability for cleanup costs if EPA took action at this site. Mr. Meehan expressed that he would agree to take responsibility for the cleanup of the site, but that he would first consult his attorney. After issuing verbal notice to the RP, the OSC utilized his Delegation of Authority (14-1-A, 5/1/85) to activate \$50,000 in emergency funding to provide site security and to begin a chemical inventory of the four buildings.

100018

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
CHRONOLOGY OF EVENTS (continued)

- 05/28/87 EPA, TAT and State personnel returned to the site to await the arrival of the ERCS contractor. Upon ERCS' arrival, a meeting was held with EPA, TAT, State, and David Cohen (Capitol's chemist). Mr. Cohen, who was also being considered as a PRP (potential responsible party), provided background information and details about materials being stored in the buildings. Bob Becker (property owner/landlord) was also advised of his potential liability concerning the site. Mr. Becker later arrived on scene and agreed to share responsibility for cleanup.
- 05/29/87 Environmental samples from around the site had been collected by TAT and given to ERCS for analysis. Firearm paraphernalia and ammunition were observed in one of the offices and confiscated by Maryland Enforcement. EPA Enforcement were on scene to discuss a bilateral consent agreement with PRPs. Press conference and television interviews were held with local media by EPA/OPA. Both RPs had a cleanup contractor (J&L Industries) provide an estimate; however, due to the contractor's noncompliance with safety regulations, only a visual assessment could be performed.
- 05/30/87 A partial inventory of buildings A and B had been completed, but due to the depletion of the \$50,000, site activities were placed on hold until an additional funding request could be approved.
- 06/02/87 An additional funding request was prepared and sent through the EPA chain of concurrence.
- 06/02/87 TAT delivered environmental samples to A&S Laboratory.
- 06/04/87 Additional funding request was approved for \$150,000; new ceiling \$200,000. TAT made Level "B" entry with J&L on which to base a cleanup cost estimate. Investigation was started by the EPA Office of Criminal Investigation. EPA Enforcement on scene to gather information about company operations/practices. Around-the-clock (24-hour) site security maintained.
- 06/10/87 A public meeting was held at the Morrell Park Recreation Center. The public showed gratitude for EPA's presence and concern.

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report
CHRONOLOGY OF EVENTS (continued)

06/11/87 TAT collected wipe samples from file boxes that were retrieved from Capitol and stored at the Office of Criminal Investigation. Samples were shipped to A&S Lab for analysis to confirm that files were free of contamination and safe to handle.

06/27/87 RP agreed to assume responsibility for cleanup. ERCS exceeded their \$30,000 ceiling with the provision of site security to date, awaiting RP decision to assume cleanup responsibility. As a result, funds were redesignated from the original \$50,000 project ceiling to cover the ERCS costs. Project expenditures did not exceed the \$50,000 Delegation of Authority activation.

07/08/87 EPA Program Elements were successful in obtaining a commitment from the RP to take over the cleanup. RP continued under the direction of EPA Enforcement. Wipe samples collected by TAT from the Capitol file boxes showed no significant contamination after review by ATSDR. EPA/ERS involvement was concluded.

08/26/87 EnPro of Baltimore was hired by RP as cleanup contractor for the duration of cleanup activity.

100020

Capitol Assay Labs Site
Baltimore, Maryland
Federal OSC Report

PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

Overall, the combined efforts of the various participating organizations/agencies participating in the Capitol Assay Labs Site enabled emergency response activities to proceed in an efficient and timely manner. There were minor delays regarding the responsible party takeover, but once EPA Enforcement became involved in the cleanup, RP activities continued smoothly.

At the time of this writing, the RP continues cleanup actions monitored by EPA Enforcement.

100021



WESTON SPER

TDD Number: 8705-39

PCS Number: 1234



BALTIMORE CAPITOL ASSAY LABS

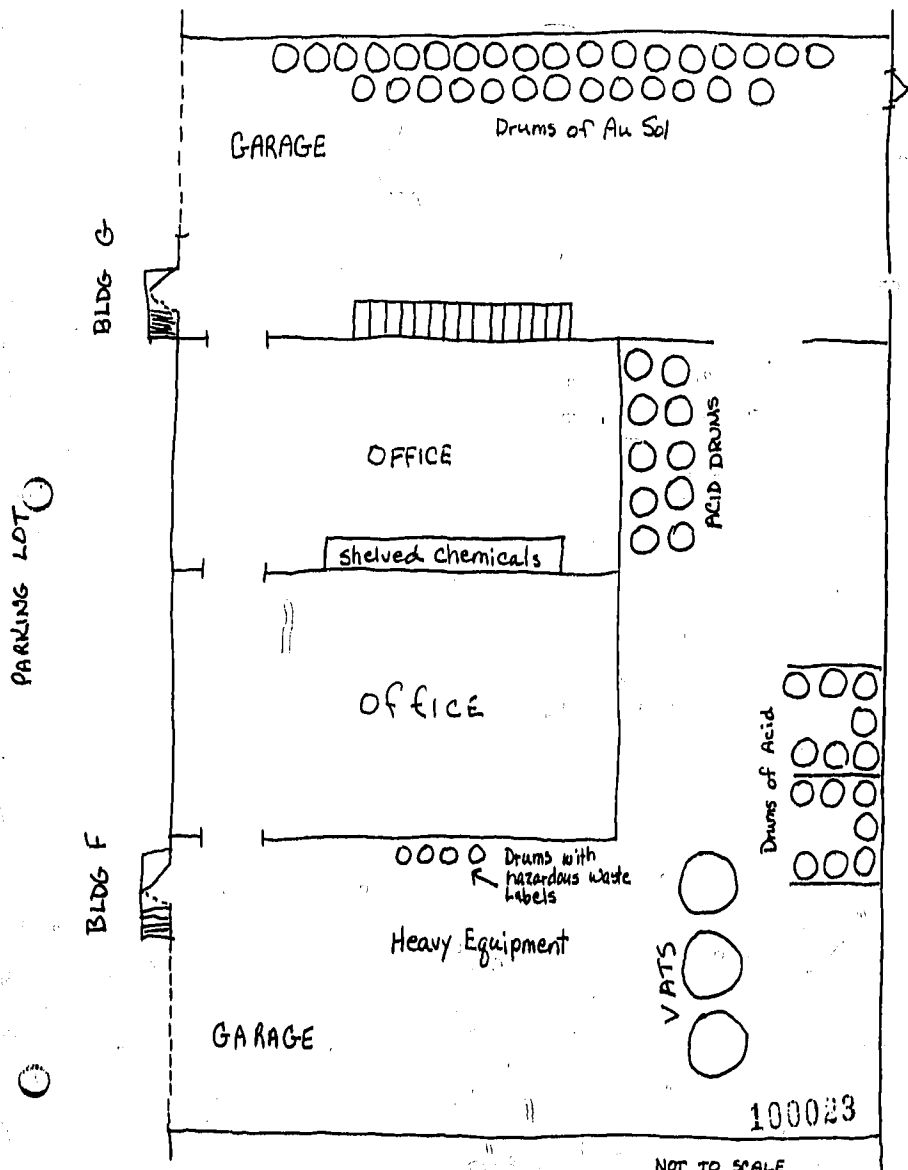
BALTIMORE MARYLAND

EMERGENCY RESPONSE

100022

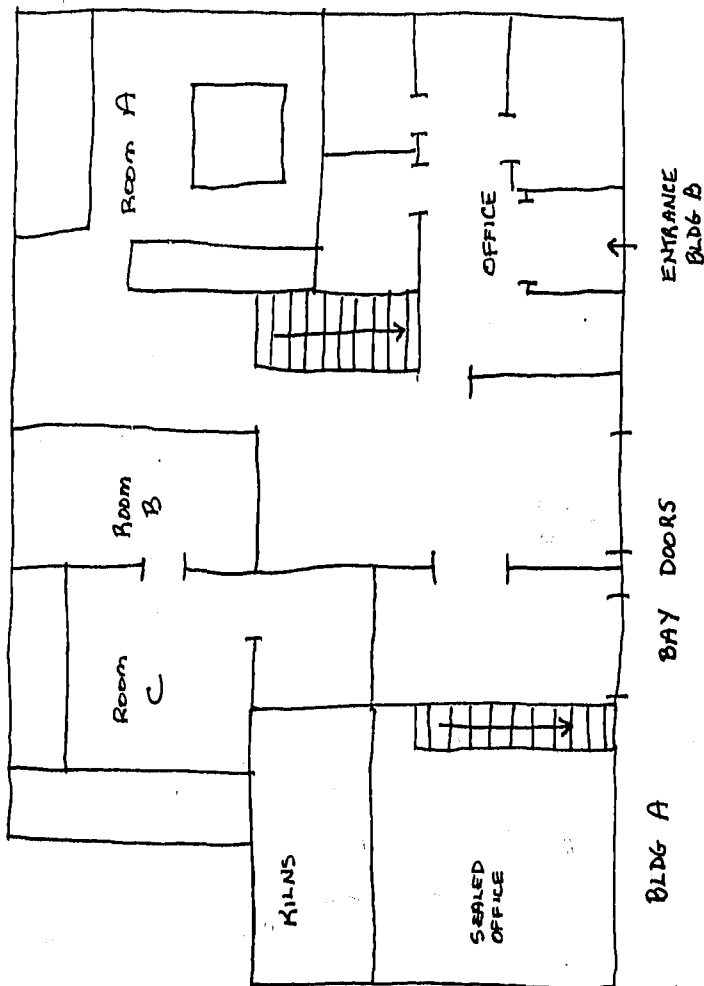
SITE SKETCH

Capital Assay Laboratories, Ltd.
Baltimore, Maryland



SITE SKETCH

Capital Assay Laboratories, Ltd.
Baltimore, Maryland

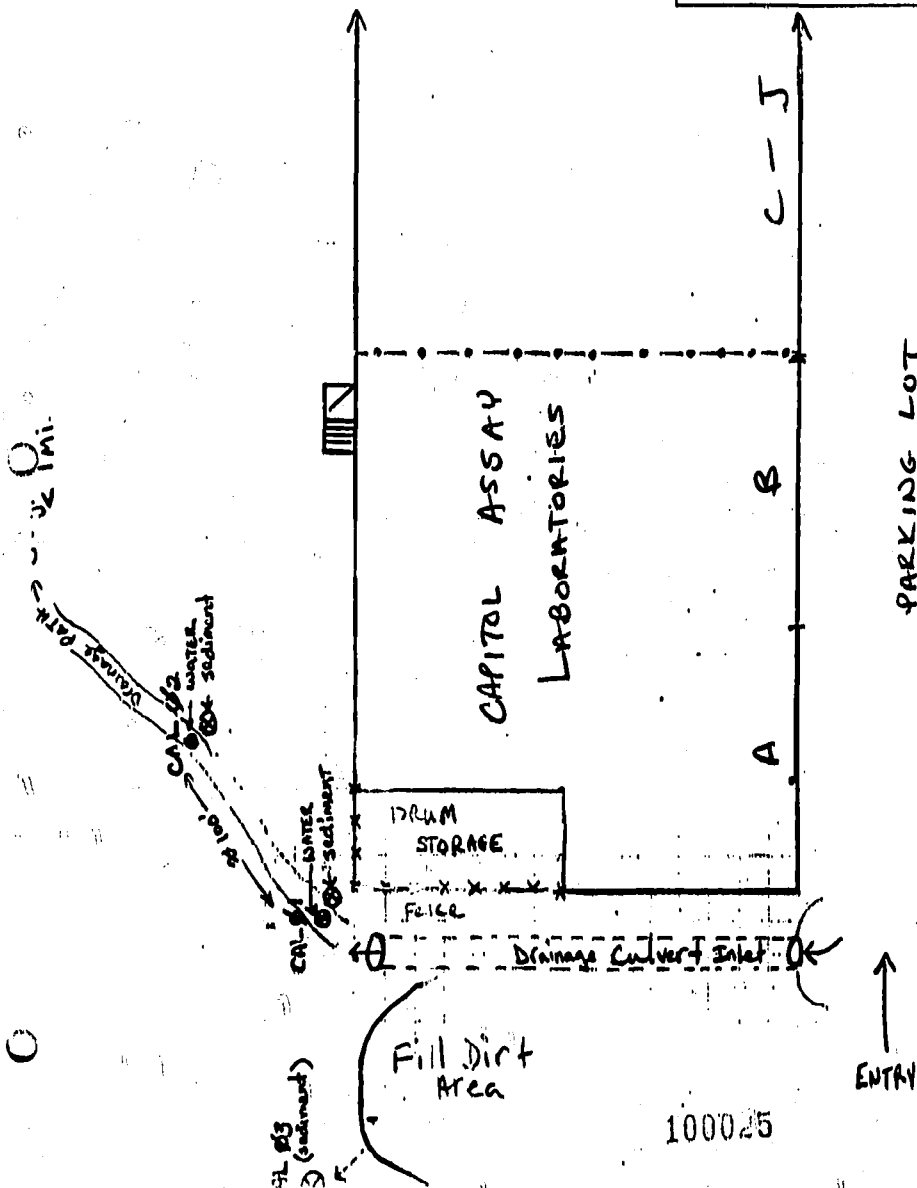


NOT TO SCALE

100024



CLIENT/SUBJECT CAPITOL ASSAY LABS Site SHEET of
TASK DESCRIPTION SAMPLE LOCATIONS W.O. NO.
PREPARED BY E. Scott DEPT TAT DATE 5/29/87 TASK NO.
MATH CHECK BY DEPT DATE APPROVED BY
METHOD REV. BY DEPT DATE DEPT DATE



ENGINEERING O.H.M. COMPUTATION SHEET

SHEET NO. _____

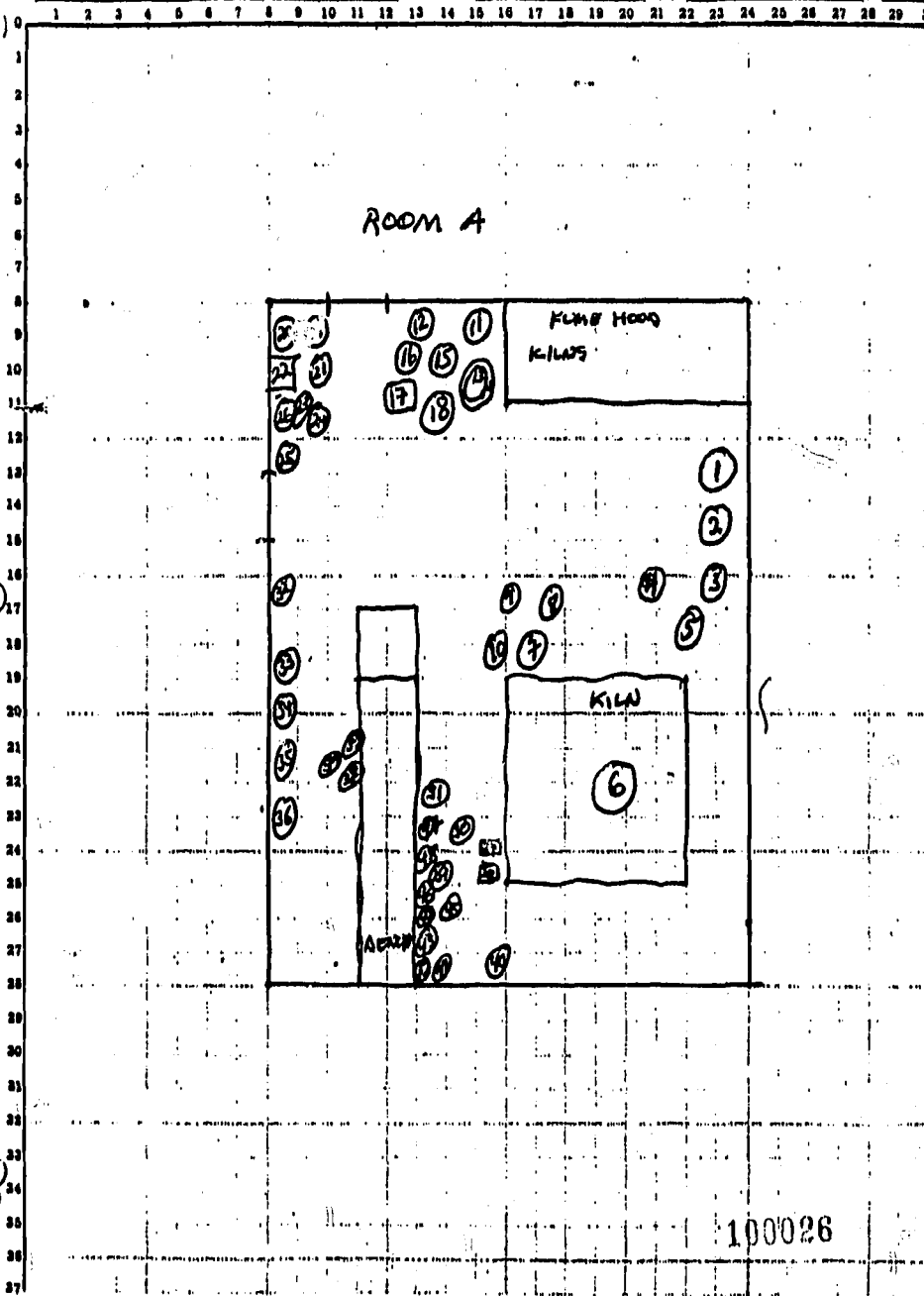
TITLE OF PROJ. OR STUDY CAPITAL ASSAY LABORATORIES LTD. PROJ. OR STUDY NO. 4401-E

SUBJECT _____ WORKS _____

COMPUTER _____

DATE _____

19 _____



100026

ENGINEERING **OHM** COMPUTATION SHEET

SHEET NO. _____

TITLE OF PROJ. OR STUDY, CAPITAL ASSAY LABORATORIES LTD. PROJ. OR STUDY NO. 4901-E

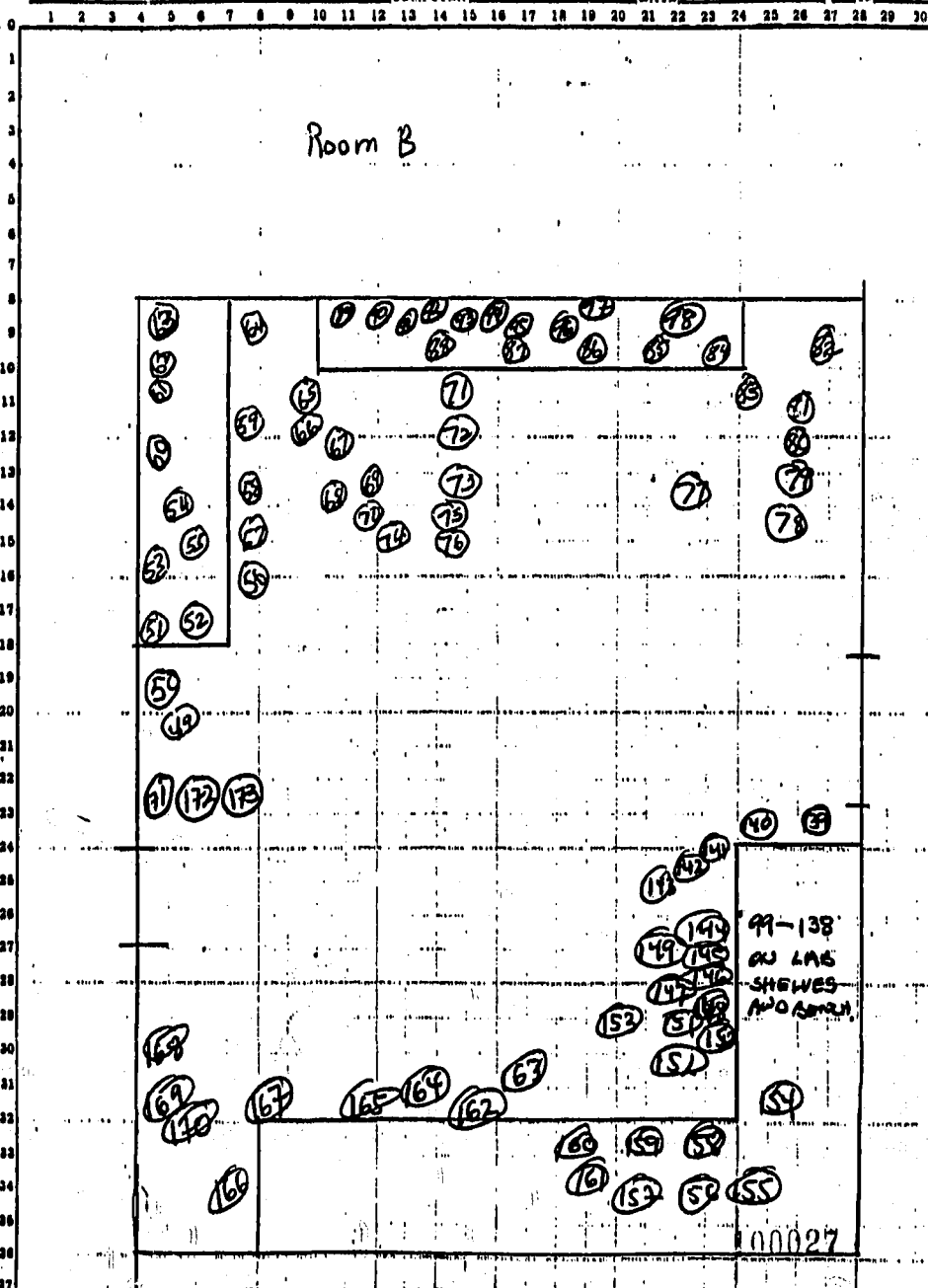
SUBJECT

WORKS

COMPUTER

DATE _____

19



ENGINEERING O.H.M. COMPUTATION SHEET

SHEET NO. _____

TITLE OF PROJ. OR STUDY CAPITAL ASSAY LABORATORIES LTD.

PROJ. OR STUDY NO. 4901-1

SUBJECT _____

WORKS _____

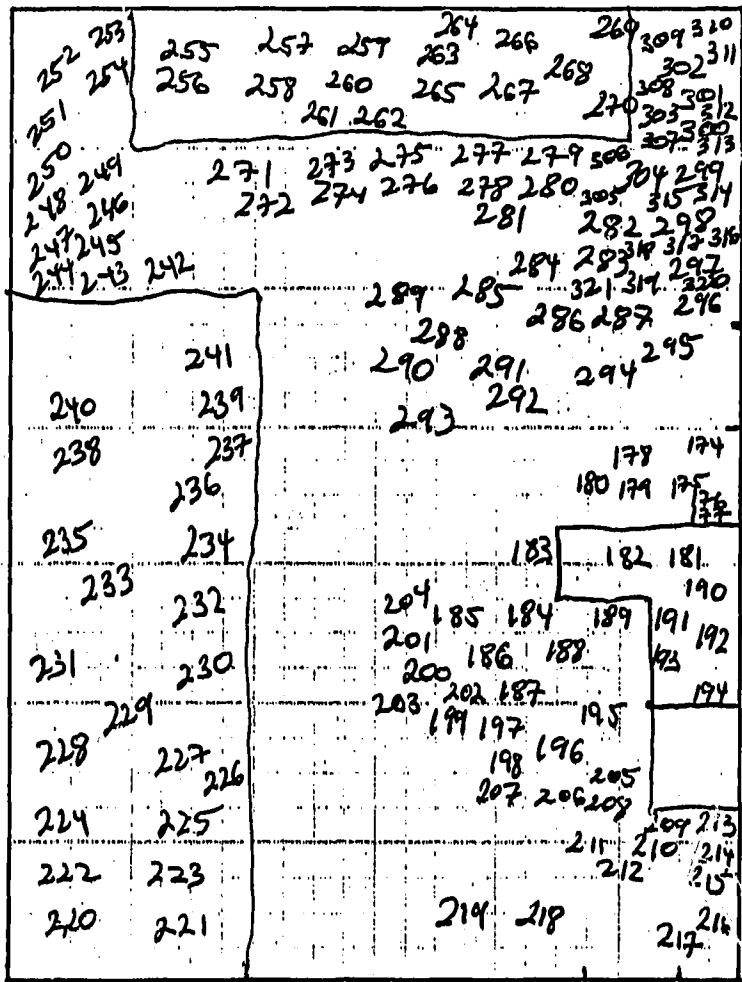
COMPUTER _____

DATE _____

19 _____

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

ROOM C



100028

SPECIAL BULLETIN A
Capitol Assay Labs Site
Whittington Avenue
Baltimore, Maryland

Date: May 28, 1987

FROM: Robert E. Caron
On-Scene Coordinator

THRU: Stephen Wassersug, Director
Hazardous Waste Management Division

THRU: Thomas Voltaggio, Chief
Superfund Branch

THRU: Thomas Massey, Chief
Emergency Response Section

I. INTRODUCTION

A preliminary assessment performed by the EPA Emergency Response Section and the Technical Assistance Team in accordance with the NCP has identified a potential risk of harm to human health and the environment posed by the presence of open and leaking hazardous substances which may present a substantial risk of harm to public health or welfare.

The Delegation of Authority 14-1-A (5/1/85) authorizes the OSC to approve CERCLA removals with a total cost of less than \$50,000. Therefore, the OSC has approved the use of CERCLA funds at this site for control of site access and completion of an inventory of hazardous substances on site.

II. BACKGROUND

The Capitol Assay Labs Site consists of four buildings on Whittington Avenue in Baltimore, which until nine weeks ago had been fully operating as a precious metal reclaiming facility. The buildings on site consist of an office, laboratory, and two storage areas, all of which contain hazardous substances including but not limited to the following (as per labelling and employee information): perchloric acid, hydrochloric acid, nitric acid, sulfuric acid, cyanide (in dry and liquid form), monohydrazine sulfate and elemental mercury.

In the recent past, unsupervised entry throughout the buildings had been taking place, as creditors of the company owner, J. Meehan, were considering removing unsecured chemicals as recoverable assets. An inspection of the facility by the

Baltimore sheriff led to an assessment of the facility by the Maryland State Department of Health and Mental Hygiene on May 26, 1987, at which time the situation warranted notification of the EPA Response Center for emergency assistance on May 27, 1987.

An emergency assessment of the property by EPA on that date revealed several hundred acid drums in various condition throughout the facility, stacked floor to ceiling in some areas, along with 500-600 smaller chemical containers and bags, and several cylinders (chlorine, acetylene) which appeared secure at the time of inspection. Conditions of extreme incompatibility exist between improperly stored acid containers, cyanides, elemental mercury, and monohydrazine sulfate.

The potential for hazardous release of chemicals through fire and accidental chemical reactions due to improper storage was observed by the EPA during the emergency assessment, and corroborated by state and local hazmat forces on scene.

III. THREAT

The threat of direct human contact with hazardous substances on site is substantial. Access to the site by creditors had been temporarily restricted by the state by installing site security personnel. However, the state contribution in this manner cannot continue indefinitely and will not prevent accidental fire or chemical reaction, and the resultant hazardous vapor releases.

IV. SCOPE OF WORK

The scope of work proposed for implementation with the emergency \$50K funding will include assuming restriction for site access, performing a complete site inventory, and taking environmental samples on the property to determine the extent of contamination outside the facility.

The proposed budget is as follows:

ERCS - \$30K
TAT - \$10K
EPA - \$10K

V. OSC ACTION

Because the conditions at the Capitol Assay Lab Site meet the NCP Section 300.65 criteria for an immediate removal action, I have approved this action. The estimated total project cost is less than \$50,000.

Robert E. Caron, OSC
U.S. EPA, Region III
Philadelphia, PA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Request for Additional Funding for the Capitol Assay Lab Site in Baltimore City, Baltimore County, MD **GATE:**

FROM: Robert E. Caron, Sr. On-Scene Coordinator
Lisa Marie Clark, Jr. On-Scene Coordinator
Emergency Response Section (3HW22)

TO: James M. Seif
Regional Administrator (3RA00)

THRU: Stephen R. Wassersaug, Director
Hazardous Waste Management Division (3HW00)

I. PURPOSE

A preliminary assessment, performed in accordance with the National Contingency Plan, has identified a potential risk of harm to human health and the environment presented by the Capitol Assay Lab Site in Baltimore City, Baltimore County, Maryland. Emergency funds in the amount of \$50,000 were activated by the OSC during the emergency response on May 27, 1987. At this time, Region III is requesting additional funds in the amount of \$150,000, which includes 15% EPA HQ. Of the funds requested, \$50K will be used to complete the assessment and the remaining \$100K will be used to begin cleanup action at the site.

II. BACKGROUND

The Capitol Assay Labs Site consists of four buildings on Whittington Avenue in Baltimore, which until nine weeks ago had been fully operating as a precious metal reclaiming facility. The buildings on site consist of an office, laboratory, and two storage areas, all of which contain hazardous substances including but not limited to the following (as per labelling and employee information): perchloric acid, hydrochloric acid, nitric acid, sulfuric acid, cyanide (in dry and liquid form), monohydrazine sulfate and elemental mercury.

100031

In the recent past, unsupervised entry throughout the buildings had taken place, as creditors of the company owner, J. Meehan, were considering removing unsecured chemicals as recoverable assets. An inspection of the facility by the Baltimore sheriff led to an assessment of the facility by the Maryland State Department of Health and Mental Hygiene on May 26, 1987, at which time the situation warranted notification of the EPA Response Center for emergency assistance on May 27, 1987. An emergency assessment of the property by EPA on that date revealed several hundred acid drums in various conditions throughout the facility, stacked floor to ceiling in some areas, along with 500-600 smaller chemical containers and bags, and several cylinders (chlorine, acetylene) which appeared secure at the time of inspection. Conditions of extreme incompatibility exist between improperly stored acid containers, cyanides, elemental mercury, and monohydrazine sulfate.

The potential for hazardous release of chemicals through fire and accidental chemical reactions due to improper storage was observed by the EPA during the emergency assessment, and corroborated by state and local hazmat forces on scene.

III. ACTIONS TAKEN TO DATE

On May 27, 1987, EPA immediately responded to a request for assistance from the MDWMA regarding a potentially hazardous situation presented by an abandoned metal plating and reclaiming facility in the city of Baltimore, Maryland. EPA, MDWMA, and TAT entered the four buildings used by the facility. The entry revealed hundreds of open drums and chemical containers in extremely incompatible situations throughout the office, laboratory, and warehouse areas. At that time, the OSC determined that a potential threat to human health and the environment existed at the site and authorized the use of CERCLA (\$50,000) Emergency Funding to provide site security and perform a chemical/container inventory of the facility. Access to the facility was restricted on May 27, 1987. No Responsible Party assumed at that time.

According to State officials, continuation of this response was beyond the capabilities of the State of Maryland. The OSC coordinated the response with the USCG (MSO Baltimore) as per the memorandum of understanding regarding emergency response activities in this jurisdiction; all State, Local, and Federal forces on scene concurred with EPA's decision to continue with the response.

100032

On May 28, 1987, ERCS was activated to begin the chemical inventory process. Before the \$50,000 funds were depleted, 321 containers were inventoried inside Building "A". Environmental samples (soil and water) were taken of a drainage area behind the facility and are currently being analyzed for priority pollutant metals, volatile organics, base neutrals, and cyanide.

The OSC directed ERCS to maintain 24-hr. site security beginning on May 28, 1986. On May, 29, 1987, EPA, USCG, and MDWMA met with the PRP to discuss clean-up options and continue negotiations for possible PRP takeover of cleanup. Currently, the OSC is awaiting the results of Enforcement's efforts with PRP negotiations.

On May 30, 1987, because costs (analytical included) were approaching the \$50,000 ceiling, the OSC was forced to shut down site operations until additional funding could be acquired. Twenty-four hour security is currently being maintained at the site.

IV. THREAT

The threat of direct human contact with hazardous substances on site is substantial. Access to the site by creditors had been temporarily restricted by the state by installing site security personnel. However, the state contribution in this manner cannot continue indefinitely and will not prevent accidental fire or chemical reaction, and the resultant hazardous vapor releases.

V. ENFORCEMENT

See attachment: Confidential Enforcement Status.

IV. PROPOSED PROJECT AND COSTS

Phase I of this project will include the completion of the inventory within the four buildings forming the facility, and the analysis of all environmental samples taken to determine possible off-site migration of contaminants. Estimated costs for this phase are \$50,000.

Phase II of the project will begin removal/cleanup activities at the facility. This phase is expected to begin in 2 (two) weeks (June 14, 1987). Estimated costs for Phase II are \$100,000.

100033

IV. PROPOSED PROJECT AND COST (continued)

Proposed costs are as follows:

Cleanup Contractor (ERCS)	\$95,500
TAT	25,000
EPA	7,000
Subtotal	\$127,500
15% EPA HQ	\$ 22,000
Total Estimated Costs	\$150,000

VII. JUSTIFICATION

In order to mitigate the ongoing threat to human health and welfare and the environment, it will be necessary for the EPA to obtain additional funding. Further assistance from any other Federal or State agency will not be forthcoming, and without a funding increase, this site will not be stabilized and secured on a timely basis. This site is not on the National Priorities List (NPL).

VIII. REGIONAL RECOMMENDATION

The conditions at the Capitol Assay Labs Site meet the criteria set forth in the National Contingency Plan Section 300.65 for a removal request. The estimated total removal project costs are \$150,000.

You may indicate your approval or disapproval by signing below.

APPROVE

James M. Seif

DATE

JUN 3 - 1987

DISAPPROVE

DATE

100034

WESTON SPER DIVISION
HAZARDOUS WASTE SITE INVESTIGATION AND EMERGENCY RESPONSE
HEALTH AND SAFETY PLAN

Assignor: Bob CARON REGION III
Date of Inspection: 5/27/87 Time: 2130 TDD No. _____
Original Safety Plan: Yes _____ No ☒ Modification No. 1

Site Name: CAPITOL Assay LABS Site

Site Address: Street No. 2901-A Whittington Ave
City Baltimore
County Baltimore
State MD Zip Code 21230

Site Contact: A. Mark Cox Phone (301) 659-2950

Directions to Site: FROM PHILA - 95 S into MD, thru
Fort McHenry Tunnel, TAKE CATON AVE WEST - which turns into
Washington Ave - go South on Wash Ave. to Potomac Ave N.E.
- see site map - attached

Map Attached: Yes ☒ No _____
If Remote Location: Latitude _____ Longitude _____
SITE HISTORY: Previous metal reclaiming - creditors owed money
Bldg. shorthills dept involved - who contacted MD DWA - per house keep
EPA notified

INCIDENT DESCRIPTION

TYPE: A) Spill _____ Air Release _____ Fire _____ HW Site ☒ Other _____
B) Assessment ☒ Sampling _____ Emergency Response ☒
Clean-up/Removal _____ Other (specify) _____
C) Urban/Residential ☒ Commercial ☒ Industrial _____
Rural _____ Remote _____

PHYSICAL DESCRIPTION

Size of Site: ~ 2 acre Terrain: flat Weather: clear

Containers Involved in the Release or Incident

Drums ☒ No. _____ Tanks ☒ No. 100035
Truck _____ License No. _____ Tanker _____ Box _____
Railroad Car _____ Tank No. _____ Box No. _____
Spill _____ Source _____ Approximate Volume _____
Other _____ # _____

MATERIALS INVOLVED:

Name	TLV	IDLH	Overexposure Symptoms
Nitric Acid		100 ppm	Irrit eyes, muc. memb.
Sulfuric Acid			
Chlorine		10 ppm	" eyes, nose, throat

SPECIAL HAZARDS: Hard Hats should be worn

ANTICIPATED LEVEL OF PROTECTION (circle one): A B C D

WHY: unknowns - possible chemical reactions

FIRST AID INSTRUCTIONS FOR KNOWN CONTAMINANTS: Per. Trained
Soap wash exposed, Act. Resp. and attention counsel

PERSONNEL EXPOSURE HAZARDS: (H=high, M=moderate, L=low, U=unknown)

Inhalation H Skin Contact H Ingestion L Radioactive U
Biological L Fire H Explosion H Unknown H

PERSONNEL PHYSICAL SAFETY HAZARDS:

Heat ✓ Cold ✓ Noise ✓ Underground Utilities ✓
Overhead Utilities ✓ Heavy Equipment ✓ Slip, Trip, Fall ✓
Sharp Objects ✓ Pressurized Airlines ✓ Cylinders ✓
Ladders ✓ Scaffolds ✓ Unguarded Openings-Wall, Floor ✓
Liquids in Open Containers, Ponds, Lagoons ✓

100036

ACTIONS TAKEN ON SITE:

Was Entry Made: YES ☒ NO ☐

Equipment Used: (circle) LEVEL A B C D WHY: UNKNOWN -
Acids, cylinders

SCBA ☐ APR ☐ Model ☐ Cart./Can. Type ☐

Tyvek ☐ Poly Tyvek ☐ Saran Tyvek ☒ Acid Suit ☐

Rain Gear ☐ Cotton Coveralls ☐

Gloves: Inner ☒ Butyl ☐ Nitrile ☐ Viton ☐ Other ☐

Foot Gear: Safety Boots ☐ Outer Boots ☐ Booties ☒ Other UNKNOWN

Description of Decontamination Used: DRY PAPER

AIR MONITORING

Performed by: TAT / EPR

Instrument Readings: Radiation Meter N/D CGI N/D

OVA ☐ HNU N/D Detector Tube N/D

Other ☐

Wind: Speed ☐ Direction ☐ Temp. ☐ Rel. Hum. ☐ B.P. ☐

Summarize Air Monitoring Data No reading chlorine and

Ammonia detector tubes. However each entry

it should be made after rechecking chlorine for

chlorine. Ammonia detector

SAMPLING Performed by: ☐

Sampling Plan (Y or N) N If yes attach copy to safety plan

No. of Samples: Solid ☐ Liquid ☐ Gas ☐ Other ☐

Laboratory: ☐

Has Lab Been Notified of Potential Hazard Level? Yes ☐ No ☐

Analyses: ☐

Sampling Comments: ☐

100037

DOCUMENTATION

Performed by: THOM Scott Butte DoneganType: Photo ☒ Log Book ☒ Recorder _____ Video _____PUBLIC IMPACTDistance to Nearest: Residence < 1 School < 1 mi Hospital 1 miPublic Building < 100 yds Other: _____Evacuation: Yes _____ No ☒ Number _____ By Whom: _____ENVIRONMENTAL IMPACT:Nearest Waterway: Gwynns Falls Distance: 1 mi

<u>Condition</u>	<u>Observed</u>	<u>Potential</u>	<u>None</u>
Surface Water Contamination	_____	<input checked="" type="checkbox"/>	_____
Ground Water Contamination	_____	<input checked="" type="checkbox"/>	_____
Drinking Water Contamination	_____	_____	<input checked="" type="checkbox"/>
Air Contamination	_____	<input checked="" type="checkbox"/>	_____
Soil Contamination	_____	<input checked="" type="checkbox"/>	_____
Stressed Vegetation	_____	<input checked="" type="checkbox"/>	_____
Dead Fish, Other Animals	_____	<input checked="" type="checkbox"/>	_____

PERSONNEL INVOLVED: (NAME, AGENCY, PHONE, ON or OFF SITE)SITE MANAGER: Kevin ScottSITE SAFETY COORDINATOR: Dave ButteHave Read & Understood The
Site Safety Plan (check)

EPA

TAT

STATE

OTHER

_____	_____
_____	_____
_____	_____
<u>E. Scott</u>	<input checked="" type="checkbox"/>
<u>Dave Butte</u>	<input checked="" type="checkbox"/>
<u>Lynn Wilder</u>	<input checked="" type="checkbox"/>
<u>John B. Schmitt</u>	<input checked="" type="checkbox"/>
_____	_____
_____	_____
_____	_____
<u>Deborah C. Jackson</u>	<input checked="" type="checkbox"/>
<u>Donald B. Henderson</u>	<input checked="" type="checkbox"/>
<u>Paul C. Hall</u>	<input checked="" type="checkbox"/>
_____	_____
_____	_____

100038

EMERGENCY INFORMATION

EMERGENCY PHONE NUMBERS:

	<u>Location</u>	<u>Phone</u>	<u>Notified (Y/N)</u>
Fire	Bulk City	911	Y
Police	Bulk City	911	Y
Ambulance		911	N
Hospital	St. Agnes Hospital		N
Nearest Phone			

DIRECTIONS TO HOSPITAL: (ATTACH MAP)

See map

ADDITIONAL EMERGENCY PHONE CONTACTS:

CHEMTREC	(800) 424-9300
TSCA HOTLINE	(800) 424-9065, (202) 554-1404
CDC	(404) 452-4100 (Day), (404) 329-2868 (Night)
BUREAU OF ALCOHOL, TOBACCO & FIREARMS	(800) 424-9555, (202) 566-7777
NATIONAL RESPONSE CENTRAL	(800) 424-8802
WESTON MEDICAL EMERGENCY SERVICE	(513) 421-3063
WESTON 24 HOUR HOTLINE	(215) 524-1925, 1926
PESTICIDE INFORMATION SERVICE	(800) 845-7633
EPA ERT EMERGENCY	(201) 321-6660
RCRA HOTLINE	(800) 424-9346
BUR. OF EXPLOSIVES, A.A. RAILWAYS	(202) 635-9500

Prepared by: Kevin Scott Date: 5/28/87
Reviewed by: Bluma Date: 6/2/87
Approved by: _____ Date: _____

SPER HSO Reviewed by: _____ Date: _____
Followup Required: Yes _____ No _____
Followup Performed: Date: _____ With: _____
Comments: _____

100039

TLX II RECV CONNECTED 28-May-87 12:22 43

EPAOHM PHA

WU INFOMASTER 4-0123478148-001 05/28/87
ICS IPMNT22 CSP
3019625115 DGM TDMT UG BALTIMORE MD 660 05-28 1124A EST
TWX 7106700716 EPAOHM PHA
EMERGENCY RESPONSE
4218 EPA PHA

POLREP I

CAPITOL ASSAY LABS SITE WHITTINGTON AVE BALTIMORE MD

I. SITUATION (1200 HOURS 5-28-87)

A. AT 2000 HOURS 5-27-87, EPA AND TAT RESPONDED TO A REQUEST FOR ASSISTANCE FROM THE MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGENE REGARDING A POTENTIALLY HAZARDOUS SITUATION PRESENTED BY AN ABANDONED METAL PLATING AND RECLAIMING FACILITY IN THE CITY OF BALTIMORE AND INITIAL ENTRY AND ASSESSMENT OF A FACILITY REVEALED HUNDREDS OF OPEN DRUMS AND CHEMICAL CONTAINERS IN EXTREMELY INCOMPATIBLE SITUATIONS THROUGHOUT THE OFFICE, LABORATORY, AND WAREHOUSE AREAS. DUE TO THE POTENTIAL THREAT TO HUMAN HEALTH AND THE ENVIRONMENT PRESENTED BY THE POTENTIAL FOR FIRE AND EXPLOSION INVOLVING HAZARDOUS CHEMICALS AT THIS SITE, THE OSC (CARON) HAS ACTIVATED THE 50 K EMERGENCY FUNDING TO PROVIDE SITE SECURITY AND COMPLETE THE CHEMICAL INVENTORY. ACCORDING TO STATE OFFICIALS, CONTINUATION OF THIS RESPONSE IS BEYOND THE CAPABILITIES OF THE STATE OF MARYLAND. NO RESPONSIBLE PARTY HAS ASSUMED RESPONSIBILITY FOR THE SITE AT THIS TIME. THE OSC HAS COORDINATED THE RESPONSE WITH USCG DF (MSO) BALTIMORE AS PER THE MEMORANDUM OF UNDERSTANDING REGARDING EMERGENCY RESPONSE ACTIVITIES IN THIS JURISDICTION; ALL STATE, LOCAL AND FEDERAL FORCES ON SCENE CONCUR WITH EPA DECISION TO CONTINUE WITH RESPONSE.

B. PERSONNEL ON SCENE 5-27-87: EPA-2 USCG-1 MDOEP/WMA-4 SECURITY-2 AND BALTIMORE CITY FIRE DEPARTMENT-1

C. WEATHER- CLEAR WARM HIGH 70'S.

II. ACTIONS TAKEN

A. EPA RECEIVED VERBAL NOTIFICATION FROM THE MDHMA AT APPROXIMATELY 1510 HOURS 5-27-87 REGARDING THE CAPITAL ASSAY LABS, AKA CAL LTD., AN ABANDONED PRECIOUS METAL RECLAIMING FACILITY IN A RESIDENTIAL/LIGHT INDUSTRIAL AREA OF BALTIMORE. STATES REQUESTED EPA ASSISTANCE IN ASSESSING POTENTIAL HAZARDS PRESENTED BY THE SITE DUE TO LIMITED STATE CAPABILITY.

B. EPA TAT TO RESPOND AT 1600 HOURS 5-27-87. TAT ON SITE AT STATE OFFICES AT 1900 HOURS THAT DATE TO OBTAIN BRIEFING FOR OSC'S CARON AND CLARK WHO ARRIVED ON SITE SHORTLY THEREAFTER. EPA TAT AND STATE (COX) ON SITE 1955 HOURS. ADDITIONAL PERSONNEL ON SITE INCLUDED MDOEP SCHMIDT, ZABAI, AND BALOG; USCG GELDMACHER; FIRE DEPARTMENT REP OHARA; AND SITE SECURITY PERSONNEL HIRED PREVIOUSLY BY STATE. 100040

C. EPA/TAT/STATE PERFORMED LEVEL B ENTRIES UNTIL 2300 HOURS 5-27-87 TO ASSESS HAZARD POTENTIAL OF SITE. SITE CONSISTS OF FOUR BUILDINGS, OFFICE, LABORATORY, AND TWO STORAGE AREAS. HUNDREDS OF DRUMS, CONTAINERS AND REAGENT BOTTLES ARE PRESENT THROUGHOUT ALL AREAS OF THE FACILITY AND ARE STACKED FLOOR TO CEILING IN SOME AREAS. THE MAJORITY OF CONTAINERS AND DRUMS ARE UNLABELED CYLINDERS OF CHLORINE GAS AND ACETYLENE PRESENT; APPEAR SECURE AT THIS TIME. DRUMS LABELED AS HAZARDOUS WASTE HAVE BEEN FOUND ON SITE. STATE INVENTORY PERFORMED 5-26-87 REVEALED AN ESTIMATED 600-700 CHEMICAL CONTAINERS READILY VISIBLE IN AND AROUND THE FACILITY.

D. OSC DIRECTED BY ERS CHIEF MASSEY TO INFORM THE STATE THAT THIS IS A 100 PERCENT FED LEAD PROJECT. ALL INFO TO BE MADE AVAILABLE, ALL ASPECTS OF CASE/CLEANUP ARE FED LEAD.

E. OSC MET WITH MSD BALTIMORE STATE AND FIRE DEPARTMENT AT 0800 HOURS 5-28-87 REGARDING FUTURE PLANS. OSC REITERATED MOU POLICY AND NEED FOR EPA PARTICIPATION AFTER 48 HOURS USC ACTION. OSC RECOMMENDS CONTINUATION OF EMERGENCY RESPONSE UNDER 50 K CERCLA DELEGATION OF AUTHORITY AT THIS TIME. ALL PARTIES PRESENT CONCURRED WITH OSC DECISION AND REQUEST TO SHARE INFORMATION AMONG ALL AGENCIES.

F. OSC CONTACTED POTENTIAL RESPONSIBLE PARTIES VIA TELEPHONE 5-28-87 REGARDING PRP TAKEOVER. PRP UNABLE TO FINANCIAL ABATE THE THREAT OF FIRE AND EXPLOSION PRESENTED BY THE SITE. THEREFORE, OSC ACTIVATES 50 K AT 1032 HOURS 5-28-87. ERCS ACTIVATED AT 1051 HOURS 5-28-87.

G. OSC NOTIFIED EPA/OPA AT 0730 HOURS 5-28-87 REGARDING SITE ACTIVITIES.

II. FUTURE PLANS

A. OSC TO MOBILIZE ERCS FOR COMPLETION OF CHEMICAL INVENTORY IN AND AROUND THE FACILITY AND FOR PROVISION OF 24 HOUR SITE SECURITY.

B. AS PER OSC INSTRUCTION, TAT TO PREPARE SCOPE OF WORK FOR INVENTORY ACTIVITIES, SITE SAFETY PLAN, CONTINGENCY PLAN (IN ACCORDANCE WITH USCG REGIONAL AND LOCAL PLANS), 50 K FUNDING REQUEST, AN ENVIRONMENTAL SAMPLING PLAN.

C. OSC TO CONTINUE WITH RESPONSE ACTIVITIES AS PLANNED, REQUEST FOR ADDITIONAL FUNDS TO FOLLOW AS NEEDED.

ROBERT CARON OSC EPA REGION III PHILADELPHIA PA

1127 EST

EPAOHM PHA

DISCONNECTED 28-May-87 12:31:18 MSG 14

100041

To: ERQ/DEPR (EPA5511)
To: B. CARON (EPA9340)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Fri 29-May-87 10:16 EDT Sys 163
Subject: BALMD, PR2
Mail Id: IPM-163-870529-092480253

POLREP #2
Capitol Assay Labs Site
Whittempton Avenue
Baltimore, Md
ATTN: T. Massey and T. Fields

I. SITUATION (2200 hours 5/28/87)

A. OSC activates \$50K emergency funding under delegation of Authority this date at 1021 hours this date to provide site security and a complete chemical inventory at the site after PRPs contacted denied cleanup responsibility. EPA, state, ERCS and TAT perform additional site entry to determine strategy for action. PRP interest in assuming responsibility for site activities apparent to OSC, EPA Legal and EPA Enforcement by C.O.R. this date. Site activities under \$50K to continue as needed under OSC supervision.

B. Personnel on scene:
EPA-4
TAT-3
MDWMA-5
BALTIMORE HEALTH DEPT-2
ERCS-6
USCG-5
PRPs- 3

C. Weather: hot, mid 80's

D. Costs to date:
ERCS: \$ 6K
TAT : \$ 4K
EPA : \$ 1K

E. State of Maryland WMA provides OSC A.M. Cox for duration of project.

II. ACTIONS TAKEN

A. Subsequent to EPA/USCG meeting in MSD Baltimore, EPA, TAT USCG, State, and fire department personnel on scene 1300 hours to perform additional assessment of site conditions. ERCS on site 1415 hours; accompanied EPA on entry at approx. 1500 hours. Site security arranged by 1430 hours.

100042

B. OSC contacts EPA legal counsel K. Rader regarding PRP intentions on site cleanup. PRP (Meehan) counsel to contact EPA by 1530 hours with decision. Site activities continue as planned under \$50K emergency funds.

C. EPA Enforcement R. Dulcey on site 1030' hours as per OSC request.

D. PRP representative D. Cohen (chemist - Capitol Assay), B. Becker (landlord) and landlord maintenance personnel on site at 1700 hours to discuss future plans and possible assumption of cleanup by PRP.

III. FUTURE PLANS

- A. ERCS to begin inventory of building contents 5/29/87.
- B. ERCS/TAT to collect environmental samples 5/29/87.
- C. Site security to continue as funding available.
- D. Emergency removal activities to continue as circumstances require.
- E. PRP meeting scheduled for 1530 hours 5/29/87.
- F. Press conference scheduled for 1400 hours 5/29/87. OPA Sinclair/state Feldman ato be on scene.

Robert E. Caron, OSC
EPA Region III
Philadelphia, PA

100043

EPADHM PHA

WU INFOMASTER 4-0024128150-001 05/30/87

ICS IPMNTZZ CSP

094820222 DGM TDMT US CHERRY HILL 287 05-30 0804A EST

TX 7106700716 EPADHM PHA

EMERGENCY RESPONSE

4218 EPA PHA

POLREP #3

CAPITOL ASSAY LABS SITE

WHITTINGTON AVENUE

BALTIMORE, MD

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1800 HOURS 5/29/87)

A. PERSONNEL ON SCENE: EPA/OSC-1, EPA/OPA-1, EPA/ENFORCEMENT-1, MDWMA-4, USCG-4, TAT-3, BALTIMORE CITY FIRE DEPARTMENT-4, ERCB-10

B. ESTIMATED COSTS TO DATE: EPA-\$2000, TAT-\$5800, ERCB-\$10,000, HQ-\$4000

C. SITE INVENTORY AND ENVIRONMENTAL SAMPLING BEGINS THIS DATE. TEMPERATURES IN THE MID-90S SLOWS THE ASSESSMENT PROCESS.

L. MDWMA OSC (COX) CONTINUES TO PROVIDE ON SITE SUPPORT.

E. USCG PROVIDES COMMAND POST FOR SITE ACTIVITIES.

F. PRP CONTINUES TO BE UNCOOPERATIVE.

G. 24 HOUR SITE SECURITY CONTINUES.

H. ERCB HAVING DIFFICULTY MEETING OSC STAFF REQUIREMENTS. OSC DIRECTED RESPONSE MANAGER TO CORRECT IMMEDIATELY.

II. ACTIONS TAKEN:

A. 0800 HOURS-OSC (CARON), TAT, AND ERCB ON SCENE TO BEGIN CHEMICAL INVENTORY (BUILDING A).

B. TATS PERFORMS ENVIRONMENTAL SAMPLING (SOIL AND WATER) OF DRAINAGE AREA BEHIND THE FACILITY. ANALYSIS (ERCB LAB) TO INCLUDE: PRIORITY POLLUTANT METALS, VOLATILE ORGANICS, BASE NEUTRALS, AND CYANIDE.

C. AIR MONITORING AND ASSESSMENT OF OFFICE CONDUCTED.

D. 1400 HOURS-1445 HOURS PRESS CONFERENCE HELD ON SITE. PERSONNEL ATTENDING INCLUDE: EPA/OPA (SINCLAIR), EPA/OSC (CARON), MDOEP (FELDMANN), MDWMA, PRP ATTORNEY, AND THE SUN.

E. 1530 HOURS EPA, USCG, AND MDWMA MEET WITH PRP TO DISCUSS CLEANUP OPTIONS AND CONTINUE NEGOTIATIONS FOR POSSIBLE PRP TAKEOVER OF CLEANUP.

F. 1545 HOURS-1617 HOURS, TV CHANNELS 2 AND 13 ON SCENE. INTERVIEW WITH EPA/OPA AND MDOEP.

G. 1706 HOURS BUILDING A CLOSED AND SECURED.

H. 1815 HOURS PRP CONTRACTOR (J&L INDUSTRIES) PERFORMS VISUAL SITE ASSESSMENT.

III. FUTURE PLANS:

A. CHEMICAL INVENTORY AND SITE SECURITY TO CONTINUE (ESTIMATED 2-3 DAYS FOR COMPLETION)

B. UPON INVENTORY COMPLETION SCOPE OF WORK TO BE DRAFTED.

C. OSC AWAITING RESULTS OF ENFORCEMENT EFFORTS WITH PRP NEGOTIATIONS.

ROBERT E CARON, OSC

U.S. EPA, REGION III

PHILADELPHIA, PA

0807 EST

EPADHM PHA

100044

To: ERD/DERR (EPA5511)
To: T.MASSEY (EPA9374)
To: F.HENDERSON (EPX2992)
From: T.MASSEY (EPA9374) Delivered: Fri 5-June-87 14:47 EDT Sys 163
Subject: POLREPS 4, 5 & 6 CAPITOL ASSAY LABS SITE
Mail Id: IPM-163-870605-133180385

CAPITOL ASSAY LABS SITE
WHITTINTON AVE
BALTIMORE, MD

POLREP #4

ATTN: TOM MASSEY AND TIM FIELDS;

I. SITUATION (1800 HRS., 5/30/87):

- A. PERSONNEL ON-SCENE: EPA/OSC-1
EPA/OPA-1
MD WMA-1
TAT-3
ERCS-9
- B. ESTIMATED COSTS TO DATE: EPA-\$2,500
TAT-\$7,600
ERCS-\$16,000
HQ-\$8,000
- C. CHEMICAL INVENTORY OF BUILDING A CONTINUES.
TEMPERATURES IN THE HIGH 90'S SLOWS LEVEL "B" OPERATIONS.
- D. MD WMA OSC (COX) CONTINUES TO PROVIDE ON-SITE SUPPORT.
- E. 24 HR SITE SECURITY CONTINUES.
- F. OSC CLARK ACTING FOR OSC CARON THIS DATE.

II. ACTIONS TAKEN:

- A. ERCS CONTINUED THE INVENTORY OF CHEMICALS/CONTAINERS IN BUILDING A. A TOTAL OF 321 CONTAINERS WERE LOGGED AND LABELLED THIS DATE. HOWEVER, BUILDING A INVENTORY IS NOT COMPLETED.
- B. OPEN MERCURY CONTAINER (5 GAL IN BLDG A) PLACE IN OVERPACK.
- C. TV CHANNELS 13 AND 11 ON-SCENE TO INTERVIEW WITH OPA SINCLAIR AND OSC CLARK.
- D. BECAUSE COSTS (ANALYTICAL INCLUDED) ARE APPROACHING THE 50K CEILING, OSC REQUESTS THAT ALL SITE OPERATIONS BE SHUT DOWN AT 1600 HRS THIS DATE. BUILDING A WAS CLOSED, AND SECURED. KEYS TO ALL LOCKS WERE GIVEN TO MD WMA COX.
- E. USCG RETRIEVED COMMAND POST.

100045

F. BALTIMORE CITY FIRE DEPARTMENT RETRIEVED FIRE HOSE.

G. ALL PERSONNEL OFF SITE AT 1730 HRS.

III. FUTURE PLANS:

A. TAT AND ERCS TO DEMOBE 5/31/87.

B. OSC PLANS TO REQUEST ADDITIONAL FUNDS IN ORDER TO COMPLETE THE ASSESSMENT OF BUILDINGS A AND B.

C. TAT TO DELIVER ENVIRONMENTAL SAMPLES TO ERCS LAB (READING, PA) ON 5/31/87. OSC REQUESTS VERBAL RESULTS IN 3 DAYS (6/3/87).

D. SITE SECURITY TO CONTINUE UNTIL FURTHER NOTICE.

ROBERT E. CARON, OSC
LISA CLARK, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100046

To: ERD/DERR (EPA5511)
To: T. MASSEY (EPA9374)
To: F. HENDERSON (EPX2992)
From: T. MASSEY (EPA9374) Delivered: Fri 5-June-87 14:55 EDT Sys 163
Subject: CAPITOL ASSAY LABS SITE POLREPS
Mail Id: IPM-163-870605-134320317

POLREP #3

CAPITOL ASSAY LABS SITE
WHITTINTON AVE
BALTIMORE, MD

ATTN: TOM MASSEY AND TIM FIELDS:

I. SITUATION (1500 HRS., 6/3/87):

- A. OSC CURRENTLY AWAITING APPROVAL ON ADDITIONAL FUNDING REQUEST SO THAT SITE ASSESSMENT CAN BE COMPLETED AND CLEANUP ACTION CAN BE STARTED.
- B. ESTIMATED COSTS TO DATE: EPA-\$3,000
TAT-\$11,000
EACS-\$16,000
HQ-\$8,000
- C. RESPONSIBLE PARTY HIRED CONTRACTOR FOR QUOTE ON CLEANUP.
- D. 24 HR. SITE SECURITY MAINTAINED WHILE ORIGINAL \$ 50K FUNDS REMAIN

II. ACTIONS TAKEN:

- A. TAT DELIVERED ENVIRONMENTAL SAMPLES TO LAB FOR ANALYSIS 6/3/87.
- B. ADDITIONAL FUNDING REQUEST PREPARED AND THROUGH THE CHAIN OF CONCURRENCE 6/2/87.
- C. ENFORCEMENT STATEMENT CURRENTLY BEING PREPARED FOR ADDITIONAL FUNDING REQUEST.
- D. EPA OPA IN CONTACT WITH TIM MURPHY, MD CONGRESSMAN TO INFORM HIM OF FUTURE PUBLIC MEETING.

III. FUTURE PLANS:

- A. OSC CLARK, TAT AND EPA ENFORCEMENT TO BE ON SCENE 6/4.
- B. RESPONSIBLE PARTY TO HAVE CONTRACTOR ON SITE TO PREPARE QUOTE TO CLEANUP SITE.
- C. SITE SECURITY TO CONTINUE UNTIL FURTHER NOTICE.
- D. PUBLIC MEETING SCHEDULED FOR JUNE 10, 1987.

ROBERT E. CARON, OSC
LISA CLARK, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100047

To: ERD/DERR (EPA5511)
To: T. MASSEY (EPA9374)
To: F. HENDERSON (EPX2992)
From: T. MASSEY (EPA9374) Delivered: Fri 5-June-87 14:57 EDT Sys 163
Subject: POLREP 6
Mail Id: IPM-163-870605-134680066

POLREP #6

CAPITOL ASSAY LABS SITE
WHITTINTON AVE
BALTIMORE, MD

ATTN: TOM MASSEY AND TIM FIELDS:

I. SITUATION (1700 HRB., 6/4/87):

- A. PERSONNEL ON SCENE: EPA-2, TAT-2, MDOEP-2, RP CONTRACTOR-3, VERSAR-2.
- B. ADDITIONAL FUNDING REQUEST APPROVED 6/4.
- C. ESTIMATED COSTS TO DATE: EPA-\$3,500
TAT-\$12,000
ERCS-\$16,000
HQ-\$8,000
- D. 24 HR. SITE SECURITY MAINTAINED WHILE ORIGINAL \$ 50K FUNDS REMAIN
- E. ENFORCEMENT UNABLE TO RETRIEVE ANY INFORMATION ABOUT RP WITHOUT A SEARCH WARRANT. CRIMINAL INVESTIGATION CURRENTLY IN PROGRESS.

II. ACTIONS TAKEN:

- A. OSC CLARK, TAT AND EPA ENFORCEMENT (DULCEY) ON SCENE THIS DATE.
- B. TAT MADE LEVEL B ENTRY WITH RP CONTRACTOR (J&L IND.). J&L ON SCENE TO PREPARE PRICE QUOTE FOR RP. FOR COST OF CLEANUP.
- C. ENFORCEMENT ON SCENE TO GATHER INFORMATION ABOUT COMPANY OPERATION/PRACTICES.

III. FUTURE PLANS:

- A. AWAITING RESULTS ON ENVIRONMENTAL SAMPLES TAKEN 5/30.
- B. SITE SECURITY TO CONTINUE UNTIL FURTHER NOTICE.
- C. PUBLIC MEETING SCHEDULED FOR JUNE 10, 1987.
- D. EPA AWAITING DECISION FROM RP TO TAKE OVER CLEANUP.

ROBERT E. CARON, OSC
LISA CLARK, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100048

To: ERD/DERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 16-July-87 15:06 EDT Sys 163
Subject: polrep 7 and final : CAPITOL ASSAY LAB SITE
Mail Id: IPM-163-870716-135950539

POLREP #7 AND FINAL

CAPITOL ASSAY LABS
WHITTINGTON AVE.
BALTIMORE CITY, MD

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION: (1700 HRS. 7/8/87)

- A. EPA PROGRAM ELEMENTS SUCCESSFULL IN OBTAINING A COMMITMENT FROM THE RESPONSIBLE PARTY TO TAKE OVER THE CLEANUP.
- B. RESULTS FROM ENVIRONMENTAL SAMPLES COLLECTED BY TAT OUTSIDE THE LAB SHOWED NO SIGNIFICANT SIGNS OF CONTAMINATION.
- C. ERCS CONTRACTOR EXCEEDED \$ 30 K BUDGET BY PROVIDING SITE SECURITY THROUGH 6/27/87 UNTIL THE RP AGREED TO TAKE RESPONSIBILITY. ADDITIONAL P.R. OF \$1 K WRITTEN TO COVER ERCS COST. FUNDS SHIFTED FROM INITIAL \$50 K FROM TAT AND EPA BUDGET.

II. ACTIONS TAKEN.

- A. PUBLIC MEETING HELD 1930 HRS 6/10/87 AT THE MORRELL PARK REC. CENTER. PUBLIC SHOWED GRATITUDE FOR EPA'S PRESENCE AND CONCERN.
- B. WIPE SAMPLES COLLECTED BY TAT FROM THE FILE BOXES OBTAINED FROM CAPITOL ASSAY LAB SHOWED NO SIGNIFICANT SIGNS OF CONTAMINATION AFTER REVIEW FROM CDC.

III. FUTURE PLANS

- A. RP CLEANUP ONGOING UNDER DIRECTION OF EPA ENFORCEMENT, RICH DULCEY.

ROBERT E. CARON, OSC
LISA M. CLARK, OSC
US EPA REGION III
PHILA., PA

100049

SPILLSEPA WSH
SPECIAL BULLETIN

CAPITOL ASSAY LABS
WHITTINGTON AVENUE
BALTIMORE CITY, MD

ATTN: TOM MASSEY, TIM FIELDS AND DICK MUELLER

I. SITUATION (1630 HRS. - 08/05/87)

- A. ERCS CONTRACTOR EXCEEDED \$31K BUDGET BY PROVIDING ADDITIONAL SITE SECURITY THROUGH 06/27/87 WHEN THE RP AGREED TO TAKE SITE RESPONSIBILITY. ERCS CONTRACTOR ALSO INCURRED COSTS FOR A LOCKSMITH NECESSITATED BY APPARENT VANDALISM AT THE SITE.
- B. FAS (MCGOWAN) SPOKE WITH MARSHA ROBINSON (O.H. MATERIALS) AND MARY ROGERS (HEADQUARTERS-PROCUREMENT) CONCERNING COST OVERRUN.
- C. MARY ROGERS INDICATED THAT THERE WAS A PROBLEM WITH THE SITE CEILING SINCE HER RECORDS INDICATED AN ERCS CEILING OF \$51K AND A DELIVERY ORDER FOR \$30K.
- D. FAS (MCGOWAN) INDICATED THAT THERE WAS AN ERROR IN THE ORIGINAL PROCUREMENT REQUEST (WHICH WAS WRITTEN FOR \$30K). AN ADDITIONAL PROCUREMENT REQUEST HAD BEEN WRITTEN FOR \$1K BRINGING THE SITE CEILING TO \$51K, AS INDICATED BY MARY ROGERS.
- E. FAS (MCGOWAN) INDICATED THAT THE ORIGINAL PROCUREMENT REQUEST SHOULD HAVE BEEN WRITTEN FOR \$30K. THAT PROCUREMENT REQUEST, ALONG WITH THE ADDITIONAL \$1K PROCUREMENT REQUEST, BROUGHT THE ERCS CEILING TO \$31K.

II. ACTIONS TAKEN

- A. FAS (MCGOWAN) PREPARED A PROCUREMENT REQUEST AND MEMO OF EXPLANATION TO HEADQUARTERS TO DECREASE THE ERCS CEILING BY \$20K FROM \$51K TO \$31K.
- B. FAS (MCGOWAN) CONTACTED MARSHA ROBINSON (O.H. MATERIALS) TO OBTAIN AN ACCURATE FINAL COST FOR THE SITE. IN ORDER TO FACILITATE THIS REQUEST, ROBINSON HAD AN INTERNAL AUDIT PERFORMED ON THE SITE RECORDS.
- C. FAS (MCGOWAN) WAS NOTIFIED BY ROBINSON (O.H. MATERIALS) THAT, BARRING ANY UNFORESEEN COSTS, THE TOTAL COSTS FOR THE SITE WERE \$32,288.41.
- D. FAS (MCGOWAN) DISCUSSED THE SITUATION WITH OSC (CLARK) AND MADE A RECOMMENDATION THAT AN INCREASE OF \$2K BE MADE TO THE ERCS CEILING. THIS WOULD BRING THE CEILING TO \$33K. THIS WOULD ALLOW FOR ANY INCIDENTAL INVOICES NOT YET SUBMITTED TO O.H. MATERIALS.
- E. OSC (CLARK) AGREED AND THE ADDITIONAL PROCUREMENT REQUEST FOR \$2K WAS PROCESSED.
- F. FAS (MCGOWAN) INFORMED ROBINSON (O.H. MATERIALS) AND ROGERS (HEADQUARTERS-PROCUREMENT) THAT THE ADDITIONAL \$2K WAS FORTHCOMING.

100050

III. FUTURE PLANS

- A. FAS (MCGOWAN) TO RECEIVE ADDITIONAL 1900.55'S FOR SITE SECURITY AND LOCKSMITH SERVICES.

ROBERT CARON, OSC
LISA M. CLARK, OSC
DONNA M. MCGOWAN, FAS
EPA - REGION III
PHILADELPHIA, PA

DISCONNECTED 07-Aug-87 12:17 12

103051

To: ERD/CERR (EPASS11)
To: T. MASSEY (EPA9374)
From: B. CARON (EPA9340) Delivered: Thu 3-Sep-87 11:20 EDT Sys 163 (32)
Subject: CAP ASSAY POLREP
Mail Id: IPM-163-870903-102110235

CAPITAL ASSAY LABS
WHITTINGTON AVE.
BALTIMORE, MD.

ATTN: TOM MASSEY AND TIM FIELDS

SPECIAL BULLETIN-PROJECT STATUS

I. SITUATION (1200 HRS., 9/1/87)

- A. EPA PROGRAM ELEMENTS SUCCESSFUL IN OBTAINING RP TAKEOVER OF CLEANUP.
- B. RP CLEANUP ONGOING UNDER CERCLA ENFORCEMENT, NOW LEAD.
- C. OSC CANNOT DETERMINE OFFICIAL SITE CLOSURE DATE AS RP CLEANUP IS ONGOING AND RP IS EXPRESSING PROBLEMS FINANCIALLY WHICH MAY RESULT IN THE NEED FOR OSC TAKEOVER. PROJECT TO REMAIN OPEN UNTIL FIRM COMMITMENTS FROM RP ARE SECURED.

II. FUTURE PLANS

- OSC TO MONITOR CLEANUP VIA ENFORCEMENT OFFICER.
- B. OSC TO ISSUE FINAL POLREP WHEN ACTION IS COMPLETE.
- C. OSC REPORT TO BE DRAFTED AND FINALIZED AND SUBMITTED AS NCP DICTATES.

ROBERT E. CARON, OSC
USEPA-III
PHILADELPHIA, PA.

100052

CAPITAL ASSAY LABS
WHITTINGTON AVENUE
BALTIMORE CITY, MD

ATTN: TIM FIELDS AND MIKE ZICKLER

SPECIAL BULLETIN - PROJECT STATUS

I. SITUATION (1200 HOURS, FRIDAY, OCTOBER 30, 1987)

- A. EPA PROGRAM ELEMENTS SUCCESSFUL IN OBTAINING RP TAKEOVER OF CLEANUP.
- B. RP CLEANUP ONGOING UNDER DIRECTION OF EPA ENFORCEMENT (RICH DUCLEY).
- C. OSC CANNOT DETERMINE OFFICIAL SITE CLOSURE DATE AT THIS TIME AS RP CLEANUP IS ONGOING. PROJECT TO REMAIN OPEN AS CONTINGENCY SHOULD FURTHER EPA ACTION BE NECESSARY, IE. SHOULD RP CLEANUP BE DETERMINED TO BE UNSATISFACTORY.

II. FUTURE PLANS

- A. OSC TO MONITOR RP CLEANUP PROGRESS VIA EPA ENFORCEMENT.
- B. OSC TO ISSUE FINAL POLREP WHEN CLEANUP IS DETERMINED TO COMPLETE AND SATISFACTORY.
- C. OSC REPORT TO BE DRAFTED, FINALIZED AND SUBMITTED IN ACCORDANCE WITH NCP REQUIREMENTS UPON OFFICIAL PROJECT CLOSURE AS DETERMINED BY THE OSC.

ROBERT E. CARON, OSC
LISA M. CLARK, OSC
EPA REGION III
PHILA., PA

100053

THE SUN Maryland



THE SUN/BOYD

Employees working under contract to the EPA prepare to enter Capital Assay Laboratories.

100054

Federal officials mobilize cleanup of leaking acid

Emergency workers enter warehouse

By Liz Bowie

Federal officials began yesterday an emergency cleanup of several hundred leaking drums of chemicals and cylinders of dangerous gases found Tuesday improperly stored in a warehouse at a Southwest Baltimore industrial park.

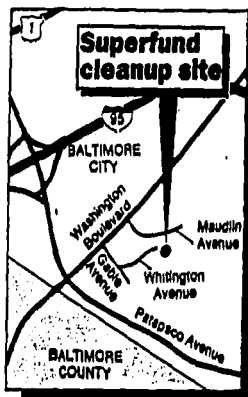
State and federal officials said they mobilized federal chemical cleanup workers because of the risk that the stored acids might mix and cause a fire or toxic cloud. They also said they did not believe officials of the financially ailing business were adequately supervising the chemicals.

The closest residential area is about a quarter-mile away in Morrell Park.

Company officials contended the federal environmental officials locked them off the grounds and said the company would like to assist in the cleanup effort.

Inside the 10,000-square-foot Capital Assay Laboratories Ltd. building are several hundred drums of chemicals, including nitric, sulfuric and hydrochloric acids. Some of the drums are new and others are badly corroded, said Bob Caron, who supervises cleanups at sites the U.S. Environmental Protection Agency designates as emergencies covered by its Superfund.

Chlorine and sulfur dioxide gases



SUN GRAPHICS

also were found at the precious metal reclaiming company in one end of a long warehouse in the Whittington Business Center not far from the intersection of Patapsco Avenue and Washington Boulevard.

The acids and gases, which are highly corrosive and can cause severe respiratory problems if the fumes are inhaled, were used in a chemical process that extracted precious metals, such as gold and silver, from scrap.

Most of the chemicals were found inside the building, but several drums were left outside behind the building.

See SUPERFUND, 8A, Col. 2

199055

Emergency workers sent to clean up leaking acid

SUPERFUND, from 8A

Yesterday EPA workers were placing leaking drums in large protective containers and separating chemicals that could be hazardous in combination. After an inventory of all the chemicals on the site, the EPA will decide how to get rid of them, Mr. Caron said. Until then, a 24-hour guard will monitor the property.

While state and EPA officials believed the contents of the building, if left unattended, presented a risk to public health, Mr. Caron said he does not believe the chemicals contaminated ground water or soil.

The site was discovered by accident when a representative from the Baltimore County sheriff's office and a collection agency went to Capital Assay Laboratories to look for anything of value that would satisfy a creditor's claim against the company. They opened the door with a crowbar, state officials said.

Upon finding the chemicals and gas cylinders, the sheriff's department alerted the Maryland Office of Environmental Programs. After visiting the site that afternoon, state health department officials then

called the EPA for emergency manpower in cleaning up the building.

The business has not been operating normally for several weeks, and an employee told state officials he had not been paid for eight or nine weeks, said Ray Feldmann, an OEP spokesman.

But an attorney for Capital Assay Laboratories said the company was operating until Tuesday, when employees came to work and discovered they could not get in because someone had padlocked the door.

Company President John P. Meighan of Baltimore County declined to comment on the situation. But his attorney, David S. Pearl, said company officials felt the EPA "came in like gang busters."

"It's a normal operating business you find in an industrial park," Mr. Pearl said.

He contends that EPA locked out the owners of the company and refused to allow them to take the company's financial records from the building.

The EPA will ask Capital Assay's owners to reimburse the government for the \$50,000 it has estimated the cleanup will cost, spokeswoman Nanci Sinclair said.